

\_AO91 (Rev. 8/01) Criminal Complaint

United States Magistrate Court  
DSG-SOTX  
FILED

## United States District Court

SOUTHERN

DISTRICT OF

TEXAS

SEP 15 2014 2B

David J. Bradley, Clerk  
Laredo Division

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

V.

Lorance JONES Jr.  
Austin, Texas -1

Case Number:

5:14m1192-1-2

Larry WILLIAMS  
Austin, Texas -2

I, the undersigned complainant state that the following is true and correct to the best of my

knowledge and belief. On or about September 11, 2014 in Webb County, in

(Date)

the Southern District of Texas, Lorance JONES Jr. andLarry WILLIAMS defendant(s),

did unlawfully conspire to transport Mexican aliens Antonio ARANA-Cervantes and Luis Abram PEREZ-Ramirez, along with five (05) other undocumented aliens from Mexico, by means of a motor vehicle within the Southern District of Texas, knowing or in reckless disregard of the fact that said undocumented aliens had come to, entered, or remained in the United States in violation of law, and transported or moved said undocumented aliens within the United States by means of motor vehicle or otherwise, in furtherance of such violation of law.

in violation of Title 8 United States Code, Section(s) 1324 (a) (1) (A) (ii)

Special Agent,

I further state that I am a(n) Homeland Security Investigations and that this complaint is based on the

Official Title

following facts: based on statements of the accused and records of the Immigration &amp; Naturalization Service.

See Attachment "A"

Continued on the attached sheet and made a part of this complaint:

☒ Yes☐ No
  
Signature of Complainant

Roy Huron

Printed Name of Complainant

Sworn to before me and signed in my presence,

September 15, 2014

Date

at

Laredo, Texas

City and State

Honorable Diana Song Quiroga

U.S. Magistrate Judge

Name and Title of Judicial Officer

  
Signature of Judicial Officer

United States of America

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vs

Lorance JONES Jr.  
Larry WILLIAMS

**[CONT OF BASIS OF COMPLAINT]**

On September 11, 2014 at approximately 03:40 A.M., a Border Patrol Agent (BPA) assigned to the U.S. Border Patrol checkpoint located on State Highway 59 northeast of Laredo, Texas conducted an immigration inspection of the driver of a red Freightliner Semi-Tractor displaying Texas License Plates (TXLP) [REDACTED] and hauling a white trailer displaying TXLP [REDACTED]. During the immigration inspection the BPA observed the driver, later identified as Lorance JONES Jr. (DOB [REDACTED]) and the passenger who was also later identified as Larry WILLIAMS (DOB [REDACTED]) both appeared to be very nervous and avoided eye contact. A BPA K-9 handler assigned to the same commercial lane notified the primary BPA that his service K-9 alerted to the presence of contraband or concealed humans within JONES' Semi-tractor. JONES was then instructed to drive to the secondary area for further inspection.

JONES proceeded to drive towards the secondary inspection area but did not stop, JONES entered back on to HWY 59 in an attempted to abscond from a secondary inspection. At that time JONES drove away from the checkpoint at a high rate of speed, leading Border Patrol Agents, along with several state and local agencies on a high speed chase, with speeds reaching in excess of 100 miles per hour. The tractor trailer traveled east on Hwy 59 in to Freer, Texas eventually traveling to I-35 north. Department of Public Safety (DPS) deployed spikes to disable the tractor trailer near Jourdanon, Texas. The tractor trailer continued traveling north on I-35 crashing into a motel near the 144 mile maker. The tractor trailer then continued north on I-35 traveling through the San Antonio downtown area eventually being stopped at the 212 mile maker in Kyle, Texas. Once the tractor stop it was discovered that there were seven additional subjects in the cab. BPAs conducted immigration inspections on the seven (7) subjects, and it was determined that all seven (7) had entered the United States illegally by wading across the Rio Grande River without being inspected and had no legal right to remain in the United States. All seven (7) of the subjects were citizens of Mexico.

BPAs transported all nine (9) subjects back to Freer, Texas. BPAs then contacted Homeland Security Investigation (HSI) Special Agents (SA) for investigative assistance with the case.

HSI SAs conducted interviews of all subjects involved. JONES was advised of his Statement of Rights to which he freely waived and agreed to speak with HSI SAs.

During JONES's interview, JONES stated they were recruited to transport the undocumented aliens (UDAs) from Laredo, TX to San Antonio, TX for financial gain. JONES stated he was going to be paid approximately four thousand two hundred dollars (\$4,200.00 USD) to transport the UDAs. JONES did not know how much WILLIAMS was going to be paid. JONES said he was hired by an individual he only knew as "JUAN" LNU to smuggle the UDAs. JONES further stated that WILLIAMS drove the tractor and trailer from Austin, TX. After being loaded with the seven (7) UDAs, WILLIAMS and JONES proceeded to the HWY 59 Border Patrol Checkpoint. JONES stated several miles from the Checkpoint he switched with WILLIAMS and drove towards the checkpoint. JONES further admitted that he had accompanied someone else on a successful alien smuggling attempt just two to three weeks prior using the same US Border Patrol Checkpoint in Freer.

At approximately 3:00pm, HSI agents read WILLIAMS his Miranda Rights. WILLIAMS refused to answer any questions pertaining to the event and kept repeating that he "did not know anything". Subsequently, the interview with WILLIAMS was terminated.

HSI SAs interviewed the seven (07) UDAs and each stated that they were transported from various stash houses and by various individuals to an awaiting tractor, noting that they were instructed to climb in the cab of the tractor and to hide underneath the bed in the sleeper compartment. The UDAs described the driver and his partner as both being African-American and speaking only English. Several UDAs described the driver as wearing red shorts, which JONES had on during his apprehension.

JONES and WILLIAMS were arrested and charged with 8 USC 1324, Transporting Undocumented Aliens. Antonio